

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE FACILITY ANNUAL REPORT - PART I

237809



1. CALENDAR YEAR COVERED 1983-1984
2. FACILITY'S NAME Frey Industries, Inc.
3. EPA ID NO. NJD000729780
4. MAILING ADDRESS P.O. Box 9307
Newark, N.J. 07104
5. STREET ADDRESS OF FACILITY 29 Riverdale Avenue
Newark, N.J. 07104
6. FACILITY CONTACT T.B. Frey PHONE NUMBER (201) 482-0153
7. CLOSURE COST ESTIMATE \$ \$500,00
8. POST-CLOSURE COST ESTIMATE (if applicable) \$ Not Available
9. CERTIFICATION STATEMENT

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties under N.J.S.A. 13:1E-1 et seq. for submitting false information, including the possibility of fine and imprisonment".

TILGHMAN B. FREY

Print or Type Name

Tilghman B. Frey

Signature

9/7/84

Date

10. In addition to the information required above and that required in Part II of this report, please submit the following required items: (where applicable)
- A. A copy of the facility's typical waste analysis form.
 - B. A copy of the facility's typical daily inspection form.
 - C. A copy of the typical notice to a generator, required under N.J.A.C. 7:26-9.4(a)1 and a listing of all generators who received this notice (only for commercial facilities).
 - D. A listing of all waste shipments rejected, according to manifest number and an explanation for each rejected shipment (only for commercial facilities).
 - E. A listing of all manifest discrepancies and an explanation of each discrepancy (only for commercial facilities).
 - F. A listing of the total quantity of each waste type treated, stored, or disposed of at the facility. This listing shall include all hazardous waste accepted at the hazardous waste facility, including all on-site generated hazardous waste.
 - G. A listing of the total quantities of each waste type consigned to each treatment, storage, or disposal process used at the facility. This listing shall include all hazardous waste accepted at the hazardous waste facility, including all on-site generated hazardous waste.
 - H. A report covering all incidents that required implementing the contingency plan.

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SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS

On 4/2/87 a RCRA inspection was conducted at Freys Industries Inc, formerly Tobar packaging of Newark, New Jersey. This inspection was conducted by NJ DEP personnel Wayne Green ^{and Arnold Schiff}. The facility personnel representing Frey Industries on this inspection was Tilghman B. Frey, President.

Finished products are brought to Freys in bags, steel drums ^{and} fiber drums. Raw ~~is from~~ materials are from approximately 70 customers. Such customers include Ashland Chemical, BASF, Mobay Chemical and Monsanto. Most products from these customers are warehoused until request is received for shipment.

Rail cars, tank-trucks and ISO tanks (tanks from ships) are also received at Frey's, Newark facility. Products are usually removed from these containers for shipment to 55 gal ~~drums~~ ^{drums}. At times materials may also be removed from 55 gal ~~drums~~ drums and transferred to rail cars, tank-trucks or isotanks.

Frey industries does not own any of these products. All products warehoused, packaged and distributed by Freys are eventually sold/shipped under owners (customers ^{Freys}) name.

The products that are warehoused at Freys include polyester resins, belonging to Ashland ^{Chemical}, Flammable liquids,

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acids, bases, corrosives and poisons are also handled at Freys Newark facility. All items are assigned a lot number with respect to their accounts. The rail cars are usually from Monsanto and may contain Orthodichlorobenzene (ONCB) and paratrichlorobenzene (PNCB). These are two class-B poisons that go to agricultural fields in Europe and may also be used for cleansing operations in wool manufacture. Paratrichlorobenzene is usually shipped in ISO tanks for Monsanto.

The ISO tanks received by Frey Industries may be from as far away as Europe and may contain 1) Butylene Oxide 2) cyclohexane 3) dimethylamino polyamine (4) Morpholine. Such materials are usually drummed for BASF. At times Acetyl chloride is dedrummed (from drum) to tanks for American Hoechst. Diethyl sulfate is also drummed to tanks for Aceto Corporation. Cresylic Acid (for petroleum industry) may also be drummed or dedrummed for General Electric (GE).

Whenever lines are steam cleaned at Frey Industries the resulting condensate is stored in 55 gal drums until another batch of the same material arrives for drumming.

Lines are normally steam-cleaned at the end of each batch of a particular material. When this occurs the owner of the material takes a sample of the condensate to determine its purity. If it meets desired specification incoming batch of raw material is added to condensate in 55 gal drum until filled.

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The drum is then shipped with other drums of raw material from the new batch. Frey industries keeps records of these drums with ^{condensate plus raw} material ~~steam cleaned~~ new batch materials. According to Mr Frey the records for these drums indicate filling of partial drums. (Copies of such records are ^{to be sent} ~~expected~~ to this office by Mr Frey).

Waste is generated at Frey Industries whenever spilled materials are cleaned up. Presently floor sweepings are not treated as hazardous. Packaging and repackaging of hazardous material ^{at Frey's} result in small quantities being spilled onto the floor and the President was advised by NJDEP personnel to classify floor sweepings as hazardous waste and manage it accordingly. Frey has also been advised to desist from being a re-packer of hazardous waste for other companies who need ^{such} assistance from time to time. This packaging of hazardous waste by Frey ^{Industries} involved the removal of such waste from actual generation site to Frey's Industries Newark facility where waste would be adequately contained ^{and} prepared for disposal ^(see attached documents re BASF returned to Wyandotte Corp and Frey Industries). This activity classifies Frey ^{Industries} as TSDF but since Frey Industries acted as a "good guy" a stern verbal warning ^{and no NOV} was issued ^{to company} when NJDEP held meeting with Frey Industries and its Attorney days before this inspection. Presently on site at the facility is an ~~an~~ underground ^{concrete} storage

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tank ~~of water~~ This tank is located below building #7. The above mentioned tank along with 1) 5 x 3000 gal tanks on 2nd Floor of Bldg #7 (2) 2) 5 x 1,500 gal tanks on 2nd Floor of Bldg #7 3) 72 x 2,000 gal tanks on 3rd Floor of Bldg #7, were the subject of a March 19, 1987 Administrative Order to Frey Industries from NJDEP.

The buildings ~~are~~ numbered 2, 3, 9 and 7 and 12 which are located at 29 Riverside Ave. (Frey Industries) contain a variety of materials. Buildings 2 and 3 are used for raw material (liquid) storage in warehouse fashion (includes 55 gal and lower size containers). Building #9 is a general product storage (includes bags and fiber drums). Outside of building #9 150 tanks ^{with} of PCB (poison) were in storage. Building #12 is being used for ^{type of general} storage with cardboard barrels and other types of containers ~~holding various materials~~.

The tanks mentioned previously were seen (except for underground tank) in building #7. ^{In} This building ~~also had~~ a repackaging of dyes/pigments were being done (Floor #2). Floor #3 was a miserable site as wet cardboard barrels with small 5/8 lab-type bottles of chemicals were seen. There were also rusted steel drums with para formaldehyde opened to atmosphere (label read "dust has potential to cause explosion when mixed with air, avoid dust/vapor, keep container closed", ~~and~~ Product was from Kramer Chemical Inc (Clifton NJ)

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Sections of floor 3 (bldg #7) were spotty with bluish marks and room had a phenol-like odor. An area with ^{bluish} caked material was also seen on the floor of the same room. The 5 x 1500 gal tanks previously mentioned were seen with a varnish like material on the outside surface of the tank. This same material formed pillars between the tanks and the flooring of the room.

Within this room of building #7, floor 3, there were numerous drums stored in a haphazard fashion atop of each other. Some containers were leaning on each other, others were on their sides with material spilling from them unto the floor. Frey has already been issued a clean up orders for this building by NJDEP (as mentioned earlier).

Outside of building #7, there is ^{a dark stained} ~~an~~ area ^{unpaved} just ~~at~~ the entrance to the building. This area is apparently contaminated with chemicals that drip from pipes/hoses used to drum fill drums on a drumming ^{filli} line located on the ground floor of building #7 about a ~~foot~~ away from stained spot. The company was advised by NJDEP personnel, and have agreed to have soil samples from this area analysed for possible contamination. If contamination exist the company should remove appropriate section of soil and incorporate clean up in schedules for

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closure of facility according to closure plan as per administrative order of March 19 from NJDEP. After removal of any contaminated soil and possible refilling with ~~lean soil~~ the company will be required to pave the area ^{with concrete or other appropriate material} to prevent future contamination.

Frey Industries was issued NOV for violations of NJAC 7:26-9.4(g) et seq, NJAC 7:26-9.6(f), NJAC 7:26-9. et seq. These violations and their expected compliance were discussed with facility personnel before proceeding to the special set of questions for code-6 facility, below.

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Answers to special questions Re Code-6 facility,
Frey Industries.

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Frey Industries of 29 Riverside Ave, Newark has bought the assets of Jobar Packaging which was formerly located at 29 Riverside Ave Newark, NJ. Jobar Packaging had apparently filed ~~s~~ with the EPA as a TSDF. The owner of Frey Industries, Tilghman B Frey has stated that he ~~is unaware~~ ^{does not know whether} Jobar had used tanks for storage of hazardous waste in fact he doesn't know whether Jobar packaging actually acted as TSDF.

In a letter to NJDEP (attached) date October 2, 1984 Tilghman B Frey requested delisting of Frey Industries from TSDF to generator only. According to Mr Frey his company is definitely not a TSDF irrespective of what Jobar packaging was, so he requested classification as generator only.

Apparently the company (Jobar packaging) or Frey Industries did not go through a formal closure. No closure plan was submitted to NJDEP by Frey Industries. Whether Jobar packaging had done this or not is unknown by Frey. Presently Frey Industries has consultants and attorneys on payroll. These personnel are employed to determine whether Jobar packaging had used tanks for storage of hazardous waste, whether they did act as TSDF and ~~from~~ other information relating to

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Frey Industries take over and subsequent responsibilities for Jobar's previous activities re hazardous waste management.

On site ^{there are} numerous tanks exist as previously described in RCRA inspection section of this report.

^{previous use of these} These tanks ~~and~~ are being determined by consultants as ~~mentioned~~ previously. The company's president Tilghman B

Frey express concern at his company's status and outlined that Frey Industries is doing what is necessary to cooperate with NJ DEP and have all matters concerning Hazardous waste management at Frey Industries resolved.

Describe the activities that result in the generation of hazardous waste.

Packaging of ~~the~~ hazardous materials usually result in some spillage. The floor sweepings from rooms in which ~~hazardous~~ ^{hazardous} materials/~~substances~~ are packaged along with any other spill clean up of hazardous materials ~~are~~ constitutes Frey-Industries hazardous wastes.

Identify the hazardous waste located on site, and estimate the approximate quantities of each.
(Identify Waste Codes)

Hazardous waste Solids ORME (Floor sweepings)
- Company was not previously classifying this as hazardous waste but as of the date of inspection they have agreed to do so.
- Quantity was therefore not ^{estimatable.} ~~estimatable.~~